

DECLARATION OF LUCERO CHAVEZ

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3 1. I, Lucero Chavez, make this declaration based on my own personal
4 knowledge, and if called as a witness, I could and would testify to the following
5 matters:

6 2. I am an attorney licensed to practice law in the State of California. I
7 am a senior staff attorney in the Immigrants' Rights Project at Public Counsel in
8 Los Angeles, California. I have been practicing immigration law for 7.5 years.

9 3. I represent 16-year-old T.B., a minor being held in the custody of the
10 United States government. T.B. was separated from her mother, J.O., after
11 crossing into the United States on or about May 17, 2018. T.B. is detained at a
12 Southwest Key Program facility in Texas. J.O. is detained at an immigration
13 detention facility located in the state of Washington.

14 4. On July 2, 2018 I met with T.B. at the Southwest Keys Facility. The
15 facility is fenced in, and you have to request access through an intercom system
16 before being allowed to drive in.

17 5. After signing in, I was escorted by T.B.'s social worker to a room right
18 by the reception area, through a secure door. The room she brought me to was
19 used as a bedroom for three detained children. It had three twin sized beds and
20 sliding panel doors. T.B.'s social worker informed me that all the attorney rooms
21 were taken, so they set up a table with two chairs in the sleeping room. The
22 room had a sink, a bathroom, and a covered window.

23 6. Throughout our meeting, T.B. seemed anxious. When she was
24 uncomfortable talking about something, she tapped her foot and shifted in her
25 seat.

26 7. T.B. told me that before coming to the United States she lived with
27 her mother, older brother and sister, and grandparents in Honduras, along with
28 an aunt and cousins. T.B. told me that her parents separated when she was

1 twelve years old. T.B. also stopped going to school at age twelve. She spent most
2 of her time at home with her mother and grandparents, helping to care for a
3 younger family member. T.B. also talked about going to church with her mother,
4 always being with her, and not being used to being away from her.

5 8. T.B. told me her dad was killed about three years ago.

6 9. T.B. told me she travelled with her mother through Guatemala and
7 Mexico. She said the most difficult part of the journey was traveling inside of a
8 trailer truck for several days. After getting out of the trailer truck, T.B. and her
9 mother continued by walking through the mountains in the middle of the night
10 with a group of people.

11 10. After sleeping in the mountains for a day, T.B. recalls about three
12 border patrol vehicles showing up. Around six to eight officers came out from
13 the vehicles in green uniforms. They spoke English to each other, and she did not
14 understand them. One of the officers spoke to T.B. in Spanish and asked her for
15 her name, age, and birth certificate. T.B.'s mom was questioned separately, but
16 they were transported to a border patrol facility together.

17 11. T.B. and her mom were separated at the border patrol facility. T.B.
18 assumed it was temporary; she was scared but expected to be reunited with her
19 mother soon. T.B., without her mother, was put into a "hielera" (an extremely
20 cold holding cell) with several other girls her age and some as young as five.
21 There were no beds in this room and no clock, so she did not know what time of
22 day it was. T.B. and other young girls cried. They were scared and wanting to be
23 with their families. T.B. saw her mother again when she was taken out of the
24 "hielera" to be fingerprinted. She did not understand what was going on and did
25 not know that she was going to be separated from her mother again. T.B. says
26 she was given small boxes of juice to drink and sandwiches that were
27 "disgusting" and seemed raw.

28 12. After a day in the "hielera," T.B., her mother, and others were
transferred to a "perrera" (like a dog pound, meaning a room divided by chain-

1 link fences into cage-like spaces). T.B. was put in one cage while her mother was
2 put in a cage in a separate area. T.B. says she was not allowed to speak to her
3 mother and she did not understand why, but that again, she assumed she would
4 be allowed to be with her mother soon. T.B. says she was at the "perrera" for two
5 days and slept on a small mattress on the ground with a foil blanket. She
6 mentioned that it was difficult to sleep because there were always people's
7 names being called and officers coming in and out to take people to be
8 questioned.

9 13. T.B. does not recall being asked if she wanted to go back to Honduras
10 or whether she was afraid of returning. T.B. remembers seeing her mother one
11 day, not seeing her the next day, and then being transferred to the shelter where
12 she is currently detained with five other girls her age the following day. T.B.
13 thought her mother would be at the shelter with her. At no point did anyone
14 explain to T.B. what was happening or tell her when she would be reunited with
15 her mother.

16 14. Once she was taken to the shelter, T.B. cried every day after realizing
17 her mother would not be there. T.B. asked facility staff about her mother but was
18 told that they did not know where she was. T.B. also recalls many girls arriving
19 soon after her at the shelter.

20 15. T.B. says she was very sad during her first few weeks at the facility
21 and that she wanted to be with her mother. Ten days passed before T.B. knew
22 anything of her mother. No one at the facility knew how she could contact her
23 mother, but her mother had made her memorize her aunt's number, and when
24 she was finally able to call her aunt, her aunt patched in her mom. T.B.'s mother
25 told her not to worry, but T.B. was still very sad. She thought they would be
26 together by now.

27 16. T.B. tells me she has now been in the shelter for 43 days and that she
28 has not seen her mother for 45 days. T.B. mentioned that she has spoken to her
mother about three times. Throughout our meeting T.B. kept repeating, "yo

1 quiero salir de aqui, me hace falta" (I want to leave this place, I need [my mom]).
2 She looked down at her hands when she said this, her voice softening and her
3 shoulders slumping.

4
5 I declare under penalty of perjury under the laws of the United States that the
6 foregoing is true and correct.

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8 Executed on July 9, 2018, in Santa Ana, California.

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10 A handwritten signature in blue ink, reading "Lucero Chavez", is written over a horizontal line.

11 Lucero Chavez
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